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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
UNITED MICROELECTRONICS
CORPORATION, INC.; FUJIAN JINHUA
INTEGRATED CIRCUIT, CO., LTD.; CHEN
ZHENGKUN, a.k.a. STEPHEN CHEN; HE
JIANTING, a.k.a. J.T. HO; and WANG
YUNGMING, a.k.a. KENNY WANG.
Defendants.) CASE NO. CR 18-465 MMC
)
) DECLARATION OF SHIAO LEE IN SUPPORT OF
) UNITED STATES' RESPONSE TO JINHUA'S
) MOTION FOR A BILL OF PARTICULARS
)
) Date: February 6, 2019
) Time: 2:15 p.m.
)
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)

I, Shiao Lee, declare as follows:

1. I am one of the Assistant United States Attorneys assigned to the prosecution of the above-captioned case.
 2. I am knowledgeable about the government's production of discovery to Fujian Jinhua Integrated Circuit Co., Ltd. ("Jinhua"). I have also reviewed the record of discovery production that has been

1 maintained by my office.

2 3. The government has produced a preliminary amount of discovery to Jinhua.

3 4. On January 11, 2019, the government produced approximately 629 pages of discovery, which
4 included:

- 5 • 31 interview transcripts;
- 6 • Instant messaging communications between defendants J.T. Ho and Kenny Wang;
- 7 • A transcript of the Taiwan Ministry of Justice's surveillance of Kenny Wang's telephone;
- 8 • A letter and Confidentiality and Intellectual Property Agreement between J.T. Ho and
9 Micron Memory Taiwan;
- 10 • Micron emails related to Kenny Wang;
- 11 • A Micron summary forensic report of Kenny Wang's company laptop with attachments;
- 12 • Documentation related to the recruiting event that took place in October 2016 in the Northern
13 District of California, including a video file, still photographs, FBI 302 report, Micron report,
14 and PDF scans of brochures and business cards obtained at the event; and
- 15 • Open source articles.

16 5. The government intends to produce additional discovery in its possession after a protective order is
17 entered. The additional discovery will include, but is not limited to, additional interview transcripts;
18 over 100 hours of audio and video recordings from interviews; a copy of materials submitted to the
19 Taiwan Ministry of Economics by United Microelectronics Corporation Inc. ("UMC") for its
20 Technical Collaboration with Jinhua; additional attachments and records obtained from Taiwan
21 authorities; results from search warrants, results from 2703(d) orders; FBI 302 reports; a list of over
22 250,000 file names referencing files located on devices seized by the Taiwan Ministry of Justice
23 Investigation Bureau; documents obtained from Micron Technology, Inc.; documents obtained from
24 LAM Research; and the results of email subscriber records requests from internet service providers.

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1 I declare under penalty of perjury that the foregoing is true to the best of my knowledge and
2 recollection. Executed this 30th day of January 2019 at San Francisco, California.

3 _____ /s/
4 SHIAO C. LEE
5 Assistant United States Attorney
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